



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

5587

AUG 12 2004

Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

REPLY TO THE ATTENTION OF:

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2004 AUG 13 A 8:55

FERNALD
LOG E-1027

RE: Area 7 TTA PSP

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) characterization of subsurface soils beneath the Area 7 (A7) Transfer Tank Area (TTA) Project Specific Plan (PSP). This PSP summarizes the sampling to be conducted to characterize the subsurface soils beneath the TTA.

U.S. EPA has enclosed several comments on the document, which need to be addressed. Therefore, U.S. EPA disapproves the Area 7 TTA PSP. U.S. DOE must submit responses to comments and a revised document within thirty (30) days receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Jamie Jameson, Fluor Fernald
Tim Poff, Fluor Fernald

5-5007

TECHNICAL REVIEW COMMENTS ON
"PROJECT SPECIFIC PLAN FOR CHARACTERIZATION OF SUBSURFACE SOILS
BENEATH THE AREA 7 TRANSFER TANK AREA"

FERNALD CLOSURE PROJECT

SPECIFIC COMMENTS

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.1 Page #: 2-1 Lines #: 28 through 33
Specific Comment #: 1

Comment: The text discusses soil sampling programs for the Transfer Tank Area (TTA) and refers the reader to Figures 2-6 through 2-11 for soil sampling locations and results. However, black-and-white versions of the figures were submitted, and it is impossible to distinguish between the color-coded sampling locations and their results. Color copies of Figures 2-6 through 2-11 should be submitted in a revised plan.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.1 Page #: 2-2 Lines #: 12 and 13
Specific Comment #: 2

Comment: The text states that uranium concentrations in the immediate vicinity of the TTA footprint ranged from the background level to 30 parts per million (ppm). However, Figure 2-9 indicates that the highest uranium concentration in the TTA footprint was 31 ppm. The text or Figure 2-9 should be revised to resolve this discrepancy.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.1 Page #: 2-3 Lines #: 15 and 16
Specific Comment #: 3

Comment: The text states that arsenic concentrations exceeded the final remediation level and that the arsenic concentrations in nine soil samples ranged from 5.1 to 14.5 ppm. A figure should be provided that shows the soil sampling locations and analytical results for arsenic.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.1 Page #: 2-3 Line #: 21
Specific Comment #: 4

Comment: The text states that well 1033 is 35 feet north of the TTA building's northwest corner. The location of well 1033 should be shown in a figure.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.3.1 Page #: 2-5 Line #: 22
Specific Comment #: 5
Comment: The text states that all samples will be analyzed for the entire list of constituents of concern (COC) discussed in Section 2.3.2. COCs are actually discussed in Section 2.2.2. The text should be revised to correct the error.

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 3.4 Page #: 3-2 Lines #: 17 through 20
Specific Comment #: 6
Comment: The text discusses radiological analytical results for soil borings A7-WTTA1, A7-WTTA2, and A7-WTTA3, which are located west of the TTA building. The locations of soil borings A7-WTTA1, A7-WTTA2, and A7-WTTA3 should be labeled in Figures 2-9, 2-10, and 2-11.